## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

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) Case No. 12 CV-415-GKF-FHM
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## UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CLAIMS OF EXEMPTION OF GARNISHEE PALERMO PARTNERS, LLC

Garnishee, Palermo Partners, LLC, by and through its counsel, Gary M. McDonald and Mary E. Kindelt, hereby moves this Court for an extension of time by which to file any claims of exemption to a Garnishment Summons served upon it to and including Friday, January 2, 2015. In support of this Motion, Palermo Partners, LLC, states as follows:

- Palermo Partners, LLC, was served with a Garnishment Summons and Garnishment Affidavit in this matter on Wednesday, December 24, 2014.
- 2. Any claims of exemption must be filed five days from receipt of the Garnishment Summons and Garnishment Affidavit.
- 3. The current deadline for Palermo Partners, LLC, to file such claims of exemption is today, Monday, December 29, 2014.

- 4. Due to the fact that the five-day deadline fell over the Christmas holiday and the following weekend, Palermo Partners, LLC, has not yet been able to determine whether it has any claims of exemption that should be filed in response to the Garnishment Summons.
- 5. Palermo Partners, LLC, requests that this Court extend the time by which Palermo Partners, LLC, must file its claims of exemption, if any, to and including Friday, January 2, 2015.
- 6. Counsel for Palermo Partners, LLC, has contacted counsel for Plaintiff and Garnishor, Exportkreditnamnden, and Plaintiff and Garnishor has no objection to the extension sought by Palermo Partners, LLC.
  - 7. Palermo Partners, LLC, has not requested any previous extensions in this matter.
  - 8. The requested extension will have no impact on any deadlines in this matter.

Respectfully submitted,

/s/ Mary E. Kindelt
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Attorneys for Garnishee, Palermo Partners, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 29, 2014, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

- John Burkhardt john.burkhardt@mcafeetaft.com
- Jared Burden jared.burden@mcafeetaft.com
- Todd B. Marcus todd.marcus@bingham.com

/s/ Mary E. Kindelt